



February 11, 2021

Mr. Gary Frazer
U.S. Fish and Wildlife Service
MS: JAO/3W
5275 Leesburg Pike
Falls Church, VA 22041

Mr. Samuel Rauch
National Marine Fisheries Service
Office of Protected Resources
1315 East-West Highway
Silver Spring, MD 20910

Docket Number: FWS-HQ-ES-2020-0102

RE: Endangered and Threatened Wildlife and Plants; Regulations for Interagency Cooperation

Dear Mr. Frazer and Mr. Rauch,

We support the proposed rule that would clarify the U.S. Fish and Wildlife Service and the National Marine Fisheries Service's interagency consultation requirements with the U.S. Forest Service (USFS) and the Bureau of Land Management (BLM) under the Endangered Species Act of 1973, as amended (ESA). The revisions would remove ambiguity stemming from *Cottonwood* for Section 7 ESA consultation at the programmatic level, and we believe the changes are needed to allow the USFS and BLM to implement forest health and wildlife habitat projects without hinderance from litigation or threats of litigation over duplicative consultations.

Since 1989, the Congressional Sportsmen's Foundation (CSF) has maintained a singleness of purpose that has guided the organization to become one of the most respected and trusted sportsmen's organization in the political arena. CSF's mission is to work with Congress, governors, and state legislatures to protect and advance hunting, angling, recreational shooting and trapping. The unique and collective force of the Congressional Sportsmen's Caucus, the Governors Sportsmen's Caucus, and the National Assembly of Sportsmen's Caucuses, working closely with CSF, and with the support of major hunting, angling, recreational shooting, and trapping organizations, serves as an unprecedented network of pro-sportsmen elected officials that advance the interests of America's hunters and anglers.

We support the proposed rule that would not require consultation to be reinitiated at the plan level, including plan amendments and revisions, for projects that are consistent with the underlying plan prepared pursuant to the Federal Land Policy and Management Act of 1976 and the National Forest Management Act when new information about a listed species or critical habitat becomes available, a

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new species is listed, or new critical habitat is designated. USFS forest plans and BLM land management plans establish frameworks for the management of specific lands but do not authorize on-the-ground projects. The proposed rule would not change project level consultation requirements, and we would submit that National Environmental Policy Act analysis is better suited at the project level for site-specific sensitive species concerns. The proposed rule would not adversely affect listed species or critical habitat because analysis at the project level ensures appropriate consultation under Section 7 of the ESA. Additional consultation at the plan level is unneeded and inefficient.

Sportsmen and women across the country rely on USFS and BLM lands for recreational access, and these lands have tremendous forest and watershed restoration needs that can be addressed through forest management projects if they are allowed to proceed and not held up by litigation. The proposed revisions would remove a costly hurdle to carrying out much needed wildlife habitat and forest health improvement projects, and we encourage you to adopt the rule proposal.

Thank you for considering our comments, and please let us know if we can provide additional information that would be helpful to finalize the rule.

Sincerely,

John Culclasure
Southeastern States Assistant Director
jculclasure@congresssionalsportsmen.org

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